1   [Submitting Counsel Below]

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10   **UNITED STATES DISTRICT COURT**

11   **NORTHERN DISTRICT OF CALIFORNIA**

12   **SAN FRANCISCO DIVISION**

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IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION	Case No. 3:23-md-03084-CRB
This Document Relates to: All Actions	**DECLARATION OF VERONICA G. GROMADA IN SUPPORT OF DEFENDANTS' PORTION OF THE JOINT LETTER REGARDING UBER'S PRODUCTION OF MARKETING MATERIALS** Judge: Hon. Lisa J. Cisneros Courtroom: G – 15th Floor

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V. GROMADA DECLARATION ISO DEFENDANTS' PORTION OF
JOINT LETTER RE: UBER'S MARKETING MATERIALS   Case No. 3:23-md-03084-CRB

1   **<u>DECLARATION OF VERONICA G. GROMADA</u>**

2   I, VERONICA G. GROMADA, declare and state as follows:

3   1.   I am an attorney in the law firm of Shook, Hardy & Bacon LLP, and I represent

4   Defendants in the above-captioned matter. I am a member of the State Bar of Texas and admitted

5   to practice pro hac vice in this Court. I make this declaration based on my own personal knowledge.

6   If called upon to testify, I could and would testify competently to the truth of the matters stated

7   herein. I submit this declaration in support of Defendants' portion of the joint letter brief regarding

8   Uber's marketing materials.

9   2.   To date, Defendants have produced approximately 40,000 documents from

10 custodial and noncustodial sources relating to the various marketing topics addressed in Plaintiffs'

11 Requests for Production.

12   3.   Defendants agreed to and produced documents from Exact Target, a noncustodial

13 source that captured email campaigns from Uber to users of its platform.

14   4.   Exact Target is a deprecated system and is no longer used by the company.

15   5.   Following the parties' agreement in September 2024 (ECF No. 1643), the parties

16 continued to confer on the scope of marketing discovery, including time limitations and topics to

17 be addressed in additional searches.

18   6.   During a conferral with Plaintiffs' counsel on December 20, Plaintiffs informed

19 Defendants that they expected Defendants to produce "everything" related to marketing.

20   7.   On December 23, Defendants identified for Plaintiffs more than 2,000 documents

21 collected from Google Drive that relate to marketing topics, which have been in Plaintiffs'

22 possession before the December 19 Discovery Status Conference.

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24   I declare under penalty of perjury that the foregoing is true and correct. Executed on

25 December 23, 2024, in Houston, Texas.

26   */s/ Veronica G. Gromada*
                                                     Veronica G. Gromada

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